

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ROSY GIRON DE REYES; JOSE DAGOBERTO REYES; FELIX ALEXIS BOLANOS; RUTH RIVAS; YOVANA JALDIN SOLIS; ESTEBAN RUBEN MOYA YRAPURA; ROSA ELENA AMAYA; and HERBERT DAVID SARAVIA CRUZ,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED PARTNERSHIP; WAPLES PROJECT LIMITED PARTNERSHIP; and A.J. DWOSKIN & ASSOCIATES, INC.,

*Defendants.*

Civil Action No. 1:16cv00563-TSE-TCB

**MEMORANDUM IN SUPPORT OF PLAINTIFFS'  
MOTION TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”) submit this memorandum in support of their Motion to File Documents under Seal. The documents that Plaintiffs request permission to file under seal are Exhibits 1-5 to Plaintiffs’ Motions *in Limine*. The exhibits appended to the Motions *in Limine* consist of documents Plaintiffs and Defendants designated confidential pursuant to the Protective Order (Dkt. 45), namely, excerpts from deposition transcripts.<sup>1</sup>

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<sup>1</sup> Although Defendants did not mark their deposition transcripts as confidential, Plaintiffs file these transcripts under seal out of an abundance of caution.

*Ashcraft v. Conoco, Inc.*, 218 F.3d 282, 288 (4th Cir. 2000), held that documents may be sealed pursuant to district court order when the court: (1) provides notice to the public and gives it an opportunity to object to sealing, (2) considers less drastic alternatives, and (3) provides specific findings in support of the decision to seal and the rejection of alternatives. Those requirements are met here.

First, Plaintiffs have concurrently filed a Notice of Motion to be docketed by the Clerk. The Notice will provide the public with an opportunity to object to the sealing of the documents in question.

Second, no feasible alternative exists to sealing these documents, in light of the Protective Order requiring information designated confidential pursuant to the Order to be filed with the court consistent with Local Rule 5 of the Eastern District of Virginia. Accordingly, the utmost discretion and confidentiality is necessary, and filings in this action should be kept under seal.

For these reasons, Plaintiffs respectfully request that the Court grant Plaintiffs' Motion to File Document under Seal. A proposed order is attached.

Respectfully submitted,

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Dated: January 11, 2021

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of January, 2021, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

                                //s//  
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